



U.S. Department of Justice

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January 29, 2025

Hon. Elizabeth A. Wolford
Chief United States District Judge
Western District of New York

Re: ***United States v. Derek Hagen | 22-CR-6099 (EAW)***
Stipulation as to Restitution

Dear Judge Wolford:

Please be advised that the government and defendant have stipulated to restitution awards in the amount of \$3,000.00 each, for the following victims listed in the PSR (Dckt. 54) at paragraph 161:

1. "2crazygurls Series – Victim Chelsea;"
2. "Angela Series – Victim Angela;"
3. "Aprilblonde Series – Victim April;"
4. "Best Necklace Series – Victim Maria;"
5. "BluesPink1 Series – Victim Fiona;"
6. "Cindy Series – Victim Cindy;"
7. "Cinderblock Blue Series – Victim Jane;"
8. "J_Blonde Series – Victim Solomon;"
9. "Jenny Series – Victim Jenny;"
10. "Lighthouse1 Series – Victim Maureen;"
11. "Marineland1 Series – Victim Sarah;"
12. "Misty Series – Victim Amy;"
13. "MotorCouch1 Series – Victim Cara;"
14. "Rap72 Series – Victim Jack;"
15. "RapJerseys Series – Victim Kauzie;"
16. "Surfer Hair Series – Victim Jessy;"
17. "Sweet White Sugar Series – Victim Pia;"
18. "Tara Series – Victim Sloane;"
19. "Teal & Pink Princess2 Series – Victim Raven;" and
20. "Vicky Series – Victim Lily."

The parties agree that the PSR contains adequate information concerning causation and outstanding loss for each of these victims. Accordingly, the parties request that the Court impose the restitution awards requested herein to satisfy the defendant's restitution requirements in this case.

Very truly yours,

TRINI E. ROSS
United States Attorney

/s/ Kyle P. Rossi

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